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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VICTORIA VAINSHTOK,) No. C 08-1381 WDB

Plaintiff,)

v.)

Department of Homeland Security,)
Michael Chertoff, Secretary, et al.,)

Defendants.)

**STIPULATION TO EXTEND DATE OF
CASE MANAGEMENT CONFERENCE;
AND [PROPOSED] ORDER**

Plaintiff, by and through her attorney of record, and Defendants by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Plaintiff filed this action on or about March 11, 2008. Defendants' response is due on May 16, 2008.

2. Pursuant to this Court's March 11, 2008 Order Setting the Case Management Conference, the parties are required to file a joint case management statement on June 11, 2008, and attend a case management conference on June 18, 2008.

3. In order to allow sufficient time for Defendants to consider an alternative resolution to this case and/or Answer and prepare a joint case management statement, the parties hereby respectfully ask this Court to extend the dates in the Court's scheduling order as follows:

STIP TO EXTEND
No. C 08-1381 WDB

1 Last day to file Defendants' Answer: July 8, 2008
2 Last day to file Joint ADR Certification: July 22, 2008
3 Last day to file/serve Joint Case Management Statement: July 29, 2008
4 Case Management Conference: August 12, 2008, at 4:00 p.m.
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6 Dated: May 16, 2008

Respectfully submitted,

7 JOSEPH P. RUSSONIELLO
8 United States Attorney

9 /s/
10 MELANIE L. PROCTOR¹
Assistant United States Attorney
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13 Dated: May 16, 2008

/s/
14 GERI N. KAHN
Attorney for Plaintiff
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17 **ORDER**

18 Pursuant to stipulation, IT IS SO ORDERED.

19 Date: May 20, 2008


20 WAYNE D. BRAZIL
United States Magistrate Judge
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28 ¹I, Melanie L. Proctor, hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this efiled document.